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June 29, 1983

Mr. Phil Bobel, Chief
Toxics & Waste Programs Branch
United States Environmental Protection Agency
Region IX
215 Fremont Street
San Francisco, CA 94105

Re: Consent Agreement Item IV.3
Union Manufacturing Inc. Facility I.D. No. AZD088301213

Dear Mr. Bobel:

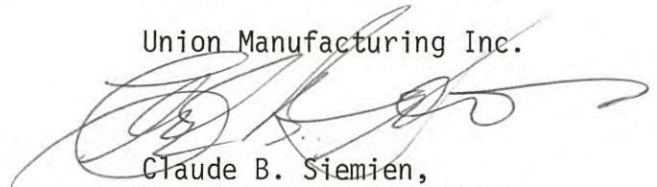
In your letter of June 20, 1983, a request was made for documentation establishing Union Manufacturing's obligation with regard to nonsudden accidental occurrences, as required under 40 CFR 265.147(b) of the Federal Register.

Please be advised that the annual sales of Union Manufacturing Inc. are less than five million dollars. Under the phase-in schedule for the requirement for nonsudden accidental occurrence coverage, the deadline for our firm to submit evidence of this coverage is January 16, 1985.

It is the hope of Union Manufacturing that complete closure of all hazardous waste areas will be completed prior to that date and the aforementioned coverage will not be required.

Respectfully submitted,

Union Manufacturing Inc.



Claude B. Siemien,
Manufacturing Manager

CBS/rw

cc: Bruce Scott
David M. Jones
Howard Krueger
Dominic Scimeca